



400 Connell Drive • Suite 1100 • Berkeley Heights, NJ • 07922  
tel 973.265.9901 • fax 973.265.9925 • www.wshblaw.com

Jared K. Levy

direct dial 914.353.3859  
email jlevy@wshblaw.com  
refer to 12373.0012

March 18, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

Re: ***Atlas Data Privacy Corp., et al v. Compact Information Systems, LLC,  
et al, (Case No. 1:24-cv-08451-HB) – Joinder in Consolidated Rule  
12(b)(6) Motion to Dismiss Plaintiffs' Complaint***

Dear Judge Bartle:

This firm represents Defendants, Compact Information Systems, LLC, Accudata Integrated Marketing, Inc., Alumnifinder, ASL Marketing, Inc., College Bound Selection Service, Deepsync Labs, Homedata, and Student Research Group (collectively, the "Defendants") in the above-referenced matter.

We write to advise the Court that pursuant to ECF No. 36, Defendants request to join the Consolidated Rule 12(b)(6) Motion to Dismiss Brief filed in the action captioned as *Atlas Data Privacy Corporation, et al. v. DM Group, Inc., et al.*, Case No. 1:24-cv-4075-HB (the "Consolidated Rule 12(b)(6) Motion to Dismiss").

For the reasons set forth in the Consolidated Rule 12(b)(6) Motion to Dismiss, Defendants respectfully request that the Court grant the motion and dismiss Plaintiffs' Complaint in this matter with prejudice.

Our File No.: 12373.0012  
March 18, 2025  
Page 2

Respectfully submitted,

WOOD, SMITH, HENNING & BERMAN LLP

By:  \_\_\_\_\_  
JARED K. LEVY  
CHRISTOPHER J. SEUSING  
*pro hac vice forthcoming*  
SEAN V. PATEL  
*pro hac vice forthcoming*  
*Attorneys for Defendants*  
400 Connell Drive, Suite 1100  
Berkeley Heights, NJ 07922  
Tel.: (973) 265-9901  
[cseusing@wshblaw.com](mailto:cseusing@wshblaw.com)  
[jlevy@wshblaw.com](mailto:jlevy@wshblaw.com)  
[spatel@wshblaw.com](mailto:spatel@wshblaw.com)